

FREDERICK COUNTY, MARYLAND

Defendants

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COMPLAINT TO QUIET TITLE

Pierce MacNair and Margaret P. MacNair, his wife, Plaintiffs, by Cleopatra Campbell and Campbell & Slater, P.C., their attorneys, sue Thomas S. Rimel, Sr. and Mary Theresa Rimel, Edward Rossig and Jane Rossig, Nettie R. Wood, the heirs of Nettie R. Wood, Carrie W. Ridgeway, the heirs of Carrie W. Ridgeway, and any and all persons claiming an interest in property known as 13 West Main Street, New Market, Frederick County, Maryland, saying:

1. They are the owners in fee simple of certain real property in New Market, Frederick County, Maryland, known as 13 West Main Street, by reason of a deed from Edward W. Sanger and Mignon M. Sanger, said deed being dated April 15, 1976, and recorded in Liber 985, folio 189 of the Land Records for Frederick County, Maryland. A copy of their deed is attached as Exhibit I.

2. A title examination of 13 West Main Street, New Market, Maryland, reveals that in the opinion of the title examiner, a defect in title exists because of an error or omission in the description of the property being conveyed.

3. The error or omission in description occurs in the chain of title for the property herein, specifically in a deed dated March 15, 1947, and recorded in Liber 462, folio 83, of the Land Records for Frederick County, Maryland, whereby title was